

EXHIBIT 2

RESPONSE TO INTERROGATORY NO. 5 (July 29, 2024):

operating system's root file system," either literally or under the doctrine of equivalents. Indeed, VirtaMove fails to cite to or describe any documentation relating to IBM Cloud Private and IBM Hybrid Cloud Mesh in its claim charts, making it nearly impossible to discern how VirtaMove believes at least IBM Cloud Private and IBM Hybrid Cloud Mesh satisfy any element and/or limitation of the asserted claims. Information describing the operation of the IBM accused products

FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 6 (November 15, 2024):

IBM understands that the IBM Cloud Kubernetes Service is the only product accused of infringement. However, IBM understands that VirtaMove has requested information regarding

FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 9 (November 15, 2024):

IBM understands that the IBM Cloud Kubernetes Service is the only product accused of infringement. However, IBM understands that VirtaMove has requested information regarding